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September 28, 2016

**VIA FAX (212) 805-7949 and E-FILING**

Daniel Patrick Moynihan  
United States District Court  
500 Pearl Street, Courtroom 12C  
New York, New York 10007-1312  
Chambers: Hon. P. Kevin Castel

Re: Young vs IntelliCell et al. Case No. 14cv4314(PKC)  
Sexauer vs IntelliCell Case No Case 15-CV- 02469

Your Honor:

The undersigned is Counsel in two matters before this Court for the Plaintiff, *Sarah Young vs IntelliCell* Case No. 14cv4314 as well as for the plaintiffs parties in the companion action *Sexauer vs IntelliCell* Case No Case 15-CV- 02469.

I am requesting the Court's consent allowing a second enlargement of the Rule 16 Case Management Schedule as issued by the Court and to include an order directing Defendants to respond to the July 2016 demands of the Plaintiffs with detailed answers. Defendants, response was wholly improper and simply denied the relevancy of the demanded information. Plaintiffs are also seeking a deposition of the Defendant Steven Victor in both his corporate and individual capacity once a response has been provided. The Court's schedule has set the Rule 16 Discovery deadline at September 30, 2016.

The request also includes a stay of all discovery until at least the next scheduled conference. For the reasons which follow with the permission of the Court I will be seeking to be relieved as counsel in these cases and assisting my clients in obtaining new counsel.

The basis for the requests exist in the fact that the undersigned was severely injured on July 19, 2016 in a high speed automobile accident. I sustained multiple injuries including six fractures to my facial bones mostly my maxilla, broken and fractured ribs, internal bleeding and a severe concussion. I have macular edema with a loss of vision from 20/20 to 20/2100. I attend physical therapy 4-5 times a week.

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My ability to concentrate and process information has been severely impacted. Most of my work is covered remotely by my former paralegal in cooperation with attorneys with whom I have a long standing relationship. I have been hiring counsel to cover my case load. This is no longer practical.

I was hopeful that the situation would resolve itself after surgery and therapy; it has not. I am advised by my doctors that it will be at least 3 months and longer until I see improvement and may not go back to work until at least then.

I have begun the process of finding substitute counsel and will advise the Court of my efforts.

For the purposes of this letter the undersigned is again requesting that all discovery be stayed until after the next schedule conference.

Respectfully,

*Douglas R. Dollinger, Esq.*  
Douglas R. Dollinger, Esq.

DRD/gf

CC: Stuart Sanders